

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

JODI C. MAHDAVI,

Plaintiff

v.

NEXTGEAR CAPITAL, INC.

Case No. 1:14-cv-0648-TSE-TCB

and

P.A.R. SERVICES, INC.,

Defendants.

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**PLAINTIFF'S OBJECTIONS TO DEFENDANT P.A.R. SERVICES, INC.'S  
TRIAL EXHIBITS**

Pursuant to the joint discovery plan filed by the parties and the scheduling order previously entered, the Plaintiff, Jodi C. Mahdavi ("Mrs. Mahdavi"), by Counsel, hereby objects to P.A.R. Services, Inc.'s ("PAR's") trial exhibits upon the following grounds:

1. Mrs. Mahdavi objects to PAR's Exhibit 1, Demand Promissory Note and Loan and Security Agreement, on the separate grounds of relevance, hearsay, lacks proper authentication or foundation for its admission into evidence, and Best Evidence.
2. Mrs. Mahdavi objects to PAR's Exhibit 2, Certificate of Title for the vehicle with the VIN #WBA6B4C53DD097953, issued December 7, 2012, on the separate grounds of hearsay, lacks proper authentication or foundation for its admission into evidence and Best Evidence.

3. Mrs. Mahdavi objects to PAR's Exhibit 3, Emails from May, 2014, and attachments, on the separate grounds of hearsay and lacks proper authentication or foundation for its admission into evidence.

4. Mrs. Mahdavi objects to PAR's Exhibit 4, NextGear Notice of Default, on the separate grounds of relevance, hearsay, is prohibited by FED. R. EVID. 403 and lacks proper authentication or foundation for its admission into evidence.

5. Mrs. Mahdavi objects to PAR's Exhibit 7, PAR Inspection and Inventory Report, on the separate grounds of hearsay, lacks proper authentication or foundation for its admission into evidence, Best Evidence and was produced after the close of discovery and should therefore be excluded as it causes unfair prejudice to Mrs. Mahdavi.

6. Mrs. Mahdavi objects to PAR's Exhibit 8, Navid Mahdavi's Answers to Rule 31 Written Deposition Questions, on the separate grounds of hearsay, is prohibited by FED. R. EVID. 403 and to the extent its use is prohibited by FED. R. EVID. 608 and 609.

Mrs. Mahdavi reserves the right to make such objections as applicable once each actual exhibit is provided. By objecting to any of PAR's exhibits, Mrs. Mahdavi does not waive her right to introduce the same exhibit as appropriate. Furthermore, Mrs. Mahdavi incorporates her objections as set forth in response to PAR's written discovery or as set forth in the depositions in this matter.

Jodi C. Mahdavi  
By Counsel

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By /s/ Jonathan E. Levine  
Jonathan E. Levine, Esquire  
VA Bar ID 45572  
*Counsel for the Plaintiff, Jodi C. Mahdavi*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of December 2014 the foregoing Plaintiff's Objections to Defendant P.A.R. Services, Inc.'s Trial Exhibits was served via CM/ECF on the following: James Bragdon, Esquire, GALLAGHER, EVELIUS & JONES, LLP, 218 N. Charles Street, Suite 400, Baltimore, Maryland 21201, jbragdon@gejlaw.com, *Co-Counsel for NextGear Capital, Inc.*; Ashley W. Winsky, Esquire, MCGUIREWOODS, LLP, 310 Fourth Street, N.E., Suite 300, Charlottesville, Virginia 22902, awinsky@mcguirewoods.com, *Co-Counsel for NextGear Capital, Inc.*; and James N. Markels, JACKSON & CAMPBELL, P.C., 1120 20th Street, N.W., South Tower, Third Floor, Washington, D.C. 20036, jmarkels@jackscamp.com, *Counsel for P.A.R. Services, Inc.*

/s/ Jonathan E. Levine  
Jonathan E. Levine, Esquire